

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
: :  
Tiffany S. Newkirk : No. 20-12374-ELF  
Debtor :

ANSWER TO MOTION OF NEWREZ LLC D/B/A SHELLPOINT MORTGAGE  
SERVICING FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362  
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The mortgage company gave the Debtor a forbearance on the payments. She believes she will have the payments prior to the hearing.
7. Denied.
8. Debtor alleges that there was a forbearance.
9. Denied.
10. No response is required.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 09/17/2021

A copy of this Answer is being served on Rebecca Ann Solarz, Esquire, and the Chapter 13 Trustee.